

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Case No. 2:23-cv-00050-JRG

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule CV-5(a)(7), Plaintiff Entropic Communications, Inc. (“Plaintiff”) hereby respectfully moves the Court for leave to file under seal Plaintiff’s Motion to Dismiss the Amended Complaint for Improper Venue pursuant to Federal Rule of Civil Procedure 12(b)(3) (the “Motion”). The Motion discusses confidential proprietary and business information, including information that the parties have previously agreed to file under seal in *Entropic Communications, LLC v. Charter Communications, Inc.*, No. 22-cv-0125(JRG) (E.D. Tex.), pursuant to a Protective Order. *See* No. 22-cv-0125(JRG) (E.D. Tex.), Dkt. 36 (Protective Order) and Dkt. 61 (Sealed Motion to Dismiss).

Counsel for Plaintiff has conferred with Counsel for Defendant Charter Communications, Inc. and this motion is unopposed.

WHEREFORE, Plaintiff respectfully requests that the Court grant its motion.

Dated: May 5, 2023

Respectfully submitted,

/s/ James Shimota by permission Andrea L. Fair

James Shimota (*pro hac vice* forthcoming)

George Summerfield (*pro hac vice* forthcoming)

K&L GATES LLP

70 W. Madison Street, Suite 3300

Chicago, IL 60602

Tel.: (312) 372-1121

Fax: (312) 827-8000

jim.shimota@klgates.com

george.summerfield@klgates.com

Darlene F. Ghavimi

Texas Bar No. 24072114

K&L GATES LLP

2801 Via Fortuna, Suite #650

Austin, TX 78746

Telephone: (512) 482-6919

Facsimile: (512) 482-6800

darlene.ghavimi@klgates.com

Peter E. Soskin (*pro hac vice* forthcoming)

K&L GATES LLP

Four Embarcadero Center, Suite 1200

San Francisco, CA 94111

Telephone: (415) 882-8200

Facsimile: (415) 882-8220

peter.soskin@klgates.com

Wesley Hill

Texas Bar No. 24032294

Andrea Fair

Texas Bar No. 24078488

WARD, SMITH & HILL, PLLC

1507 Bill Owens Pkwy

Longview, TX 75604

Tel: (903) 757-6400

wh@wsfirm.com

andrea@wsfirm.com

ATTORNEYS FOR PLAINTIFF

ENTROPIC COMMUNICATIONS, LLC

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiff has complied with the meet and confer requirement in Local Rule CV-7(h). Counsel for Defendant Charter Communications, Inc. indicated that it does not oppose the relief sought in this motion.

/s/ Andrea L. Fair
Andrea L. Fair

CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2023, I caused to be served a copy of the foregoing motion on all counsel of record via the Court's CM/ECF system.

/s/ Andrea L. Fair
Andrea L. Fair